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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Anna H. Williams,

Plaintiff,

v.

Experian Information Solutions,
Inc., Equifax Information Services
LLC and Trans Union LLC,

Defendants.

Case No. 2:17-cv-02813-RFB-GWF

**Joint Stipulation and Order to
Extend Discovery**

(First Request)

1 Plaintiffs Anna H. Williams (collectively, “Plaintiffs”) and Trans Union LLC
 2 (“Defendant” and together with Plaintiff as the “Parties”) by and through their
 3 counsel of record hereby stipulate to modify the Court’s Order, ECF No. 16, to
 4 extend:

- 5 (1) the last date to disclose experts from April 9, 2018, to **June 6, 2018**
- 6 (2) the last date to disclose rebuttal experts from May 7, 2018, to **July 6, 2018**
- 7 (3) the last date to complete discovery from June 6, 2018, to **August 6, 2018**;
- 8 (4) the last date to file dispositive motions from July 6, 2018, to **September**
 9 **6, 2018**; and
- 10 (5) the last date to file the proposed joint pretrial order from August 6, 2018,
 11 to **October 8, 2018**.

12 Pursuant to LR 26-4, good cause exists to amend the Scheduling Order. The
 13 Parties have diligently pursued discovery. Plaintiff has propounded written
 14 discovery requests and is continuing to meet and confer with Trans Union regarding
 15 certain documents withheld. The Parties ran into scheduling conflicts with Trans
 16 Union’s Rule 30(b)(6) witness and Plaintiff has noticed Trans Union’s deposition
 17 for April 20, 2018. Trans Union has noticed Plaintiff’s deposition for April 3, 2018.
 18 Furthermore, the Parties are actively discussing resolution of this case. This request
 19 for extension of deadlines is made specifically in this fee-shifting matter since the
 20 taking of depositions are a significant expense. The Parties ran into limitations
 21 based on the availability of the Parties for deposition and therefore seek to extend
 22 the expert disclosures deadlines and the corresponding discovery deadlines.

23 Pursuant to LR 26-4(a), Plaintiff has propounded written discovery requests
 24 upon all defendants, Trans Union has propounded discovery on Plaintiff. Trans
 25 Union noticed Plaintiff’s depositions and Plaintiff has noticed Trans Union’s
 26 deposition.

27 Pursuant to LR 26-4(b), the Parties request additional time to continue to meet
 28 and confer about discovery disputes, conduct depositions and disclose experts, as

1 necessary. The Parties specifically agree that no class discovery will be conducted
2 unless and until this Court grants Plaintiff's Motion for Leave to file Second
3 Amended Complaint. ECF No. 42. Should this court grant that motion, the Parties
4 will meet and confer regarding class discovery and file an updated proposed
5 discovery plan and scheduling order relating to class discovery.

6 Pursuant to LR 26-4(d), the Parties propose the following discovery schedule:

- 7 (1) the last date to disclose experts shall be **June 6, 2018**
8 (2) the last date to disclose rebuttal experts shall be **July 6, 2018**
9 (3) the last date to complete discovery shall be **August 6, 2018**;
10 (4) the last date to file dispositive motions shall be **September 6, 2018**; and
11 (5) the last date to file the proposed joint pretrial order shall be **October 8,**
12 **2018.**

13 For these reasons, the Parties jointly request that this Court modify the
14 Scheduling Order to provide an additional 60 days to complete discovery, and the in
15 the ordinary course file dispositive motions, and the proposed joint pretrial order as
16 described in the proposed timeline above.

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1 This is the Parties' first request for an extension of these deadlines.
2 DATED this 30th day of March 2018.

3 **KAZEROUNI LAW GROUP, APC**

LEWIS BRISBOIS BISGAARD

4 By: /s/ Michael Kind
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10 **ORDER**

11 IT IS HEREBY ORDERED that the Order, ECF No 16, is modified to extend
12 the discovery deadlines as follows:

- 13 (1) the last date to disclose experts shall be **June 6, 2018**
14 (2) the last date to disclose rebuttal experts shall be **July 6, 2018**
15 (3) the last date to complete discovery shall be **August 6, 2018**;
16 (4) the last date to file dispositive motions shall be **September 6, 2018**; and
17 (5) the last date to file the proposed joint pretrial order shall be **October 8,**
18 **2018.**

19 IT IS SO ORDERED.

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21 UNITED STATES MAGISTRATE JUDGE

22 Dated: 4/2/2018
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on March 30, 2018, the foregoing stipulations was filed and served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

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